

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
)
W.R. GRACE & CO., <i>et al.</i> ,) Case No. 01-1139 (JKF)
)
Debtors.) Jointly Administered
)
) Objection Date: November 22, 2006 @ 4:00 p.m.
) Hearing Date: December 5, 2006 @ 1:00 p.m.
	Before the Honorable Judith K. Fitzgerald, U.S.
	Bankruptcy Court, 5414 U.S. Steel Tower, 600 Grant
	Street, Pittsburgh, PA 15219

NOTICE OF MOTION

TO: ALL PARTIES ON THE MASTER SERVICE LIST

PLEASE TAKE NOTICE, that on November 7, 2006, David T. Austern, the Court-appointed legal representative for future asbestos claimants (the "Future Claimants' Representative") filed and served the attached **Motion for an Order Pursuant to Section 107(b) of the Bankruptcy Code, Rule 9018 of the Federal Rules of Bankruptcy Procedure, and Local Rule 9018-1(b), Authorizing the Future Claimants' Representative, and Directing the Clerk of the Court, to File Under Seal the Future Claimants' Representative's Memorandum in Support and Joinder in the Official Committee of Asbestos Personal Injury Claimants' Motion to Compel Production of Documents** (the "Motion"), with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 5th Floor, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE, that any responses to the Motion must be in writing and filed with the Bankruptcy Court on or before **November 22, 2006 at 4:00 p.m.**

PLEASE TAKE FURTHER NOTICE, that at the same time, you must also serve a copy of the response upon the undersigned counsel, so that it is received on or before **November 22, 2006 at 4:00 p.m.**

A HEARING ON THE MOTION WILL BE HELD, only if a timely objection is filed, on **December 5, 2006 at 1:00 p.m.** before the Honorable Judith K. Fitzgerald, United States Bankruptcy Court, 5414 U.S. Steel Tower, 600 Grant Street, Pittsburgh, PA 15219.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

November 7, 2006

Respectfully submitted,

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